

**From:** Eric Wedemeyer [mailto:ewedemeyer@co.shasta.ca.us]  
**Sent:** Thursday, November 04, 2010 10:35 AM  
**To:** Groundwater Elevation Support  
**Subject:** Comments on Draft "Procedures Monitor Entity Reporting"

I have reviewed the subject document and have the following comments:

The "Notification Requirements" for the Monitoring Entity (ME) requirements contain the requirement for the ME to provide the basin (GIS) shape file. That should not be a requirement, though it might be optional for ME's that have better basin boundary information than the DWR currently maintains. As a practical matter, the Shasta County Water Agency got these shape files from the DWR. Why should we send them back?

The document allows entities to notify the DWR of their intent to assume monitoring of wells that the DWR currently monitors. It is unclear whether an entity will be able to list itself as willing to assume monitoring for other ME's. In Shasta County's case, there are 8 basins in the northeastern part of the county. This area is in the Upper Pit IRWM and, since they are responsible for integrating the water management of the area, they should monitor the basins. However, it is not clear that they are actively planning to do the monitoring and, since they are an all volunteer group, we have had difficulty maintain contact with them. SBx 7-6 seems to make the County the ME of last resort, though, so if the local IRWM fails to register or report, Shasta County might find itself penalized for another entity's failure. It would be beneficial if the form allowed entities to list themselves as "back-up" for other ME's and volunteered to help coordinate among ME's after the January 1 registration deadline.

Finally, at the August 18, 2010, ACWA/DWR workshop, the DWR intimated that monitoring must begin before July 2011. The document indicates (reasonably) that the DWR will still be reviewing the Monitoring Entities and monitoring plans, and monitoring to begin in September. I just want to be sure that the printed date is accurate.

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